

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

)	
MYNETTE TECHNOLOGIES, INC.)	
and STEVEN M. COLBY,)	
)	
Plaintiffs,)	Case No. 16-cv-01647-RTH
)	
v.)	Judge Ryan T. Holte
)	
THE UNITED STATES,)	
)	
Defendant,)	
)	
and)	
)	
GEMALTO, INC. and IDEMIA IDENTITY)	
& SECURITY USA LLC,)	
)	
Intervenor-Defendants.)	
)	

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME FOR
PARTIES TO FILE RESPONSIVE AND REPLY BRIEFS**

WHEREAS, on December 5, 2022, the Court issued an Opinion and Order granting-in-part Defendants’ Motion for Sanctions. (ECF No. 153)

WHEREAS, the Parties filed a Joint Motion for Enlargement of Time to File Joint Submissions on May 12, 2023;

WHEREAS, the Court set the following deadlines for the Parties to file opening briefs and responses: Defendants file (jointly or individually) (an) opening brief(s): (1) responding to plaintiffs’ positions in the parties’ May 17, 2023 Joint Status Report (“JSR”), ECF No. 170; and (2) proposing any edits to plaintiffs’ covenant not to sue proposal in Appendix A of the JSR on June 2, 2023; Plaintiffs file a response to defendants’ Motion for Reconsideration and a response

to Defendants' Opening Brief(s) on the covenant not to sue by June 16, 2023; and, Defendants file a reply in support of their Motion for Reconsideration by July 7, 2023, ECF No. 172, May 18, 2023 Court Order.

WHEREAS, Defendants The United States and Gemalto filed their Opening Brief Concerning Covenant Not to Sue on June 2, 2023, and Defendant Idemia filed a separate Brief Concerning Covenant Not to Sue on June 2, 2023.

WHEREAS, Plaintiffs seek the Court's permission for four (4) additional days to prepare and file their Responsive Briefs. The reasons for this request are that Plaintiffs' co-counsel, Eric Maurer, is in trial, lead counsel was in court on another matter most of the day on June 13, 2023, and lead counsel's assistant will be unavailable because of personal issues on June 15/16, 2023. Defendants consent to the requested extension on the condition that Defendants will receive a reciprocal enlargement of time on their reply and that this will be Plaintiffs' final extension request.

Plaintiffs respectfully request that the Court grant their request for a four-day enlargement of time to respond to Defendants' Opening Brief on the covenant not to sue and Defendants' Motion for Reconsideration. With this enlargement, the deadline for the Plaintiffs to file a response to Defendants' Motion for Reconsideration and a response to Defendants' Opening Brief(s) on the covenant not to sue will be June 20, 2023, and the deadline for Defendants to file a reply in support of their Motion for Reconsideration will be July 11, 2023.

Respectfully Submitted,¹

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June 14, 2023

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June 14, 2023

¹ Pursuant to RCFC 20(b) of Appendix E, the filing attorney represents that the other parties have reviewed this document and consent to its filing.

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June 14, 2023